

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707
Attorneys For Secured Creditor USAA Federal Savings
Bank
Harold Kaplan HK0226

In Re:

Keith A. Holmes

Gwenna L Holmes,

Debtors,

Case No.: **18-31849-ABA**

Chapter: 13

Judge: Andrew B. Altenburg Jr.

**USAA FEDERAL SAVINGS BANK'S NOTICE OF DEBTOR'S REQUEST
FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor USAA Federal Savings Bank ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 34 TALL OAKS DR, CLEMENTON New Jersey 08021 as evidenced by claim number 5 on the Court's claim register. Creditor, at this time, does not waive any rights to

collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

By: /s/ Harold N. Kaplan

Harold N. Kaplan, Esquire

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)
RAS Citron, LLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707
Attorneys For Secured Creditor USAA Federal Savings
Bank
ATTY, Esq. BAR #

In Re:

Keith A. Holmes

Gwenna L Holmes,

Debtors,

Case No.: **18-31849-ABA**

Chapter: 13

Judge: Andrew B. Altenburg Jr.

CERTIFICATION OF SERVICE

1. I, Harold Kaplan , represent USAA Federal Savings Bank in this matter.
2. On May 12, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Notice Of Debtor's Request For Forbearance Due To The Covid-19 Pandemic.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: May 1, 2020

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 470-321-7112
By: /s/ Harold N. Kaplan
Harold N. Kaplan, Esquire

Bar ID: HK0226
Email: hkaplan@rasnj.com

Name and Address of Party Served			Relationship of Party to the	Mode of Service
			Case	
Ronald E. Norman Law Office of Ronald E. Norman Washington Professional Campus II 901 Route 168 Suite 407A Turnersville, NJ 08012			Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829			Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
Gwenna L Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829			Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002			Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other		

		(as authorized by the court*)	
Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other	
		(as authorized by the court*)	
Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other	
		(as authorized by the court*)	
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other	
		(as authorized by the court*)	